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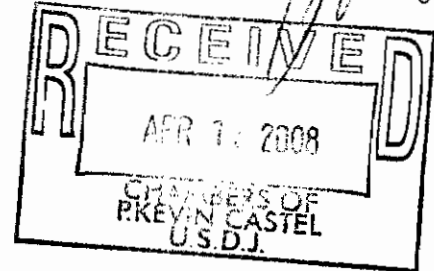
MEMO ENDORSED

April 17, 2008

BY MESSENGER

Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 2200  
New York, NY 10007

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Re: Giorgos B Maritime Ltd. v. Reynolds Shipping (USA) LLC, *et al.*  
07 Civ. 10387 (KPC)  
Our file: 2600026

Dear Judge Castel:

We represent plaintiff Giorgos B Maritime Ltd. in this Rule B maritime attachment action.

We write to request the Court's leave, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, to amend the Verified Complaint a second time. The Court may remember that on January 15, 2008, plaintiff presented an Amended Verified Complaint along with Amended Ex Parte Order for Process of Maritime Attachment and Garnishment in this matter, which modified the caption by setting forth several variations of the defendant's name. The Court subsequently issued the Amended Ex Parte Order for Process of Maritime Attachment and Garnishment.

Plaintiff now asks the Court for leave to add a new defendant, Steven C. Reynolds, to this action. Upon information and belief, Mr. Reynolds was an organizer of defendant corporation Reynolds Shipping (USA) LLC. Further upon information and belief, the charter party that is the subject matter of this action was entered into by Mr. Reynolds personally before the defendant corporation was formally formed in Oklahoma.

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- We understand that under Oklahoma law, the organizer of a limited liability corporation, such as Mr. Reynolds, would be liable for a contract entered into in the name of the limited liability corporation prior to its formation. For this reason, plaintiff would like to add Mr. Reynolds personally as a defendant in this action.

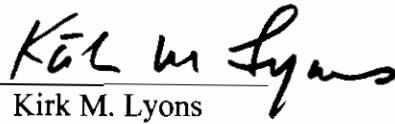
For your guidance, enclosed is a draft of the Second Amended Verified Complaint that plaintiff would like to file with the Court's permission.

We thank you for your attention to this matter.

Respectfully yours,

**Lyons & Flood, LLP**

By:

  
Kirk M. Lyons

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